



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

NR  
F. #2020R0338

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 1, 2021

By Email and ECF

Jean D. Barrett, Esq.  
Ruhnke & Barrett  
47 Park Street  
Montclair, NJ 07042

Jeremy Gutman, Esq.  
40 Fulton Street, 23rd Floor  
New York, New York 10038

Re: United States v. Kent Bulloch and William Young, Sr.  
Criminal Docket No. 20-181(PK)

Dear Ms. Barrett and Mr. Gutman:

Enclosed please find attached hereto the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure.

Please find enclosed the search warrants and related affidavits for:

1. An AOL email account (the "Young AOL Account") and one Skype account used by William Young (20-M-281);
2. The Young AOL Account and a mobile telephone used by William Young (20-M-366); and
3. A Gmail and Comcast email accounts (the "Bulloch Email Accounts") and two mobile telephones used by Kent Bulloch (20-M-512).

To date, the government's prosecution has completed its review of materials from Young's AOL Account and the Bulloch Email Accounts and identified materials responsive to the above-referenced search warrants.<sup>1</sup> The government is preparing these

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<sup>1</sup> Potentially privileged materials from these accounts have not been made available to the prosecution team for review.

materials for production and will produce them as soon as they are available. The government expects that the volume of responsive materials for the Young AOL Account will be approximately 400 emails (and attachments) and the volume of responsive materials from Bulloch Email Accounts will be approximately 150 emails (and attachments).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

SETH D. DUCHARME  
Acting United States Attorney

By: /s/ Nathan Reilly  
Nathan Reilly  
Assistant U.S. Attorney  
(718) 254-6196

Enclosures

cc: Clerk of the Court (PK)) (by ECF) (without enclosures)